

FINAL MEETING SUMMARY

HANFORD ADVISORY BOARD SITE-WIDE PERMIT COMMITTEE OF THE WHOLE

August 8, 2012

Richland, WA

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This is only a summary of issues and actions in this meeting. It may not represent the fullness of ideas discussed or opinions given, and should not be used as a substitute for actual public involvement or public comment on any particular topic unless specifically identified as such.

Opening Session

Welcome, COTW purpose, and introductions

Susan Leckband, Hanford Advisory Board (Board or HAB) chair welcomed participants to the Committee of the Whole (COTW) meeting and introductions were made. She said the purpose of the meeting is to consider draft advice on the Site-Wide Permit. She reminded the COTW that the Washington State Department of Ecology (Ecology) requested that the Board offer advice on this document and the Permit is also identified as a Tri-Party Agreement (TPA) priority for 2012. There is precedent for this type of meeting and type of advice, which is different than typical Board advice. Board comments for the Tank Closure and Waste Management (TC&WM) Environmental Impact Statement (EIS) included a mixture of advice points and general comments. The Board submitted a consensus advice document to the TPA agencies and the advice document was also submitted as a direct comment to the TC&WM EIS. Susan L. said the Permit advice, if approved, could also serve a dual purpose. She noted that the advice does provide more detail than typical Board advice, but the Board has submitted this type of advice in the past. Ecology specifically asked the Board to provide detailed advice in order to help Ecology understand the logic beyond the advice points. Susan L. said that the advice will not be adopted today. An agreement today would mean there is consensus among the COTW to bring the draft advice forward at the September Board meeting. The advice is owned by the Board; not any one committee or

individual. Susan noted that there have been many people who put a lot of work into developing this advice and providing comments on previous drafts.

Overview of the agenda and ground rules

Susan Hayman, EnviroIssues, said the opening session will provide a framework for the subsequent discussion. Ecology will first introduce the Site-Wide Permit and then the co-lead Issue Managers (IMs) for the advice will introduce the draft advice. There will be a general question and answer opportunity before discussing the specific draft advice to address general questions and concerns. Once general concerns have been resolved and a path forward is determined, the COTW can discuss specific advice points where there are disagreements or clarification questions. Susan H. reviewed the HAB ground rules and provided a copy of the draft advice (Attachment 2).

Introduction to the Site-Wide Permit

Dieter Bohrmann, Ecology, gave a presentation with general information on the Site-Wide Permit (Attachment 3).

Jane Hedges, Ecology, thanked everyone on the Board who worked to develop the draft advice, especially the IMs. She said Ecology truly appreciates and values any advice the Board can offer on the Site-Wide Permit. The Permit is a priority for Ecology in terms of regulatory oversight and there are a number of Ecology staff members present who are able to answer any questions throughout the day's conversation.

Introduction to the Draft Advice

Liz Mattson, co-lead IM for the Site-wide Permit advice, said that not every document referenced in the Site-wide Permit is available online. Some information can only be found at two information repositories or requested on disc, especially information related to the Waste Treatment Plant (WTP) and any sensitive materials.

Liz said part of the intention of this introduction to the draft advice is to prepare for the introduction that will be given during the actual September Board meeting. She said the introduction will need to be modified after today's meeting depending on decisions made about how the advice will be formatted. She thanked everyone for their participation and noted that each opinion matters, even when there is disagreement. The Permit was last issued in 1994 and the Board has been preparing for release of the new Permit for many years. She said Ecology has been exceptional in working with the Board throughout the process and that the advice writing process has been different than what is typically undertaken. Ecology asked the Board to provide comments by unit and for those comments to be more detailed. The Site-Wide Permit itself is so specific that generalized comments are not overly helpful. Ecology specifically requested comments on any missing conditions or modifications that would make the conditions more effective.

Liz said the IMs divided up sections of the Permit to review and put in a lot of work to meet Ecology's request. She acknowledged the advice is long, but that it is also not unprecedented as Susan L. noted. Liz

asked the COTW to consider whether or not they value the Permit as a tool for cleanup since the draft advice is written from that perspective and it is the value system tying the advice together. The COTW should consider the relevance of the advice and remember that Ecology asked for this level of detail. The detail reflects the Board's desire for a robust cleanup.

Liz said the advice is structured to begin with general advice points and then moves into individual permit units. The advice does not cover every Permit unit; only those units that were identified as having some area of question or concern were included in the advice.

General Q&A about the Site-Wide Permit and Draft Advice

Committee Questions and Response

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

C: While Ecology has asked for a detailed review of the Site-wide Permit, it is unlikely such detail can pass Board consensus. It would be helpful to find a mechanism that would allow detailed comments to reach Ecology without requiring full consensus. The people who developed the advice could submit the detailed document as individual contributors.

C: It is surprising to be asking about whether the Board values the Site-Wide Permit as a tool for cleanup. The Board supports the regulators and wants to ensure they can do their job effectively. The Site-Wide Permit is a fundamental tool for cleanup.

C: The conversation during yesterday's Tank Waste Committee (TWC) meeting was not meant to question the usefulness of the Site-Wide Permit; the question was more focused on whether the Board should be repeating regulatory requirements in advice. Advice on clarification or to amplify regulations is reasonable. The Board should avoid creating conflicting points about regulations or conflicting statements about the agency that should be responsible for enforcing regulations.

C: Ecology has requested a greater level of detail for justifying the Board's position to Ecology. Even when the Board agrees with a permit condition, it will be helpful for Ecology if the Board can state that in the advice. Ecology's request to state points of agreement supports the redundancy in the advice.

C: Redundancy can be useful from a funding perspective; the more the Board supports redundancy, the greater probability of funding.

C: Since Ecology is anticipating a lot of comments, it is very important for the Board to state points of agreement. The IMs drafting this advice were not thinking in those terms. It may be useful to add a general comment outlining areas of the Permit that the Board specifically supports.

C: There is a lot of complexity in regulatory authority at the Hanford Site. Washington State regulations did not enter into law until approximately a decade after the Comprehensive Environmental Response,

Compensation and Liability Act (CERCLA). CERCLA is enforced by the United States Environmental Protection Agency (EPA). The Hanford Site uses a one regulator concept where in some cases Ecology implements CERCLA under the authority of EPA. Ecology is the regulatory agency responsible for overseeing the Resource, Conservation and Recovery Act (RCRA).

C: There is unevenness in the level of specificity within some of the advice points. Accuracy is important and inaccuracy can lead to disagreement since it can be hard to understand what the advice is based on if the documentation is not thorough or accurate.

C: One option is to divide the document into the General Advice Points section and all subsequent sections, beginning with the Parts I and II Conditions plus the background document. The general comments could be made into official advice and everything else could be an addendum to that advice.

C: There are references in the draft advice to the notes document and comments discussed by the IM team that were drafted into the advice points. These include document reference numbers or references to state laws. These references can be put into the document as Ecology has requested. The notes document includes citations as well as conversations that set the context for the advice points. Any advice points under the specific units beyond the general advice that the Board would like to include with the general advice would need to be pulled forward if the Board decides to divide the document into advice points and an addendum.

C: It will be important for the Board to go through and understand each advice point, which will be difficult because of time constraints. The Board could almost send the advice to Ecology as it is currently written since Ecology has repeatedly stated how general discussion can be very helpful to the agencies.

C: The Board is structured as a consensus board. There was an objection to the last piece of advice that went forward and there will likely be objections to this piece of advice as well. It is unlikely the Board will reach consensus. The Board should not issue advice that does not have full consensus because the Board was never meant to function that way.

C: There are occasions when the Board puts forward documents that do not have full consensus. Round Robin discussions are a good example where Board members are able to each express their own opinions that are given to the TPA agencies without requiring full consensus.

C: There are many activities on Site that occur routinely, such as calibrating instruments in the lab. The draft advice suggests some of the activities that are done on-site everyday are not actually being done. The Board could offer advice on items to be included in a checklist for an oversight or assessment agency.

C: The Board frequently discusses safety culture at the Hanford Site and the hazards analysis that occurs during pre-meetings as part of the Integrated Safety Management (ISM) program. Are people trained to conduct those analysis and clearly explain them to workers? There is a litany of pre-job work that should be detailed in depth, even though Ecology does have the Permit. The advice would be a more valuable tool if it focused on requirements from Ecology and what meeting those requirements mean. The Board

should avoid implying that certain on-going actions are actually not occurring. A lot of work has gone into writing the draft advice, but it is important for those working on the advice to respect the work being done at the Hanford Site. It may be more helpful to tell Ecology they should verify what is being done instead of telling them to actually do those things.

C: The Board can offer recommendations for actions that are already taking place. The responding agencies can describe how the actions are conducted if they are already following Board recommendations. These types of advice points are not necessarily a criticism of work at the Hanford Site. There is a lot of sensitivity at the Hanford Site about any sort of criticism of the United States Department of Energy (DOE) or the contractor. The intent of the draft advice is not to criticize; it is just to ensure nothing is left out of the Permit. The agencies can get recognition for the actions that are already taking place.

C: The Permit is a tool that lays out what should occur at the Hanford Site. Job manuals are not generally seen as a criticism for not doing the job. The draft advice was never intended to criticize the people working at the Hanford Site. It only states what the Board would like the Permit to include in the conditions, which is what Ecology asked of the Board.

R: [Ecology] The Permit is supposed to set standards for operations or activities. It does not accuse DOE of not doing any of those activities. Ecology hopes that DOE is already doing everything outlined in the Permit.

C: DOE might take the position that they believe they are doing work the proper way, but that does not eliminate the need for the regulators. Looking at the history of the Hanford Site, there were many activities that occurred in the past which never would have been permitted to occur today. The regulators want to ensure those types of activities do not happen again.

C: Some Board members are cautions about bringing something forward without fully understanding the implications of the advice points.

C: There is sensitivity to criticism, but that is not what the Permit advice is about. Some points might be intended to be critical, but there are not many. Detail is extremely useful whenever considering any sort of permit in order to defend decisions to management. The Permit can be used as a tool for workers to explain to their management that they have to follow a certain procedure. Sometimes a worker will want to follow a certain procedure, but management will not want to fund the necessary activities because of other priorities. The Board can put a preamble at the front of the advice that states the advice is not meant to be a criticism. It is a reflection of what the Board would like to see done on the Hanford Site and what might already be occurring.

C: Detail is important to really articulate what the requirements should be. If given a choice, management will revert back to cost and schedule so they may reduce the frequencies of calibration if there is not a specific number laid out in the Permit. In order to maintain the attention of management, the Permit should have standards that must be upheld. Contractors change frequently at the Hanford Site and each

new contractor brings their own standards of performance. The Permit should include reliable conditions that are vital to the path forward.

C: The Site-Wide Permit is the largest and most complex permit that has ever been issued in the United States. It covers the most contaminated and out-of-compliance facility ever considered by any regulator in the United States. The Board should consider the implications of that instead of focusing on whether there is implied criticism. The advice is an implied criticism of the facilities. There have been violations of federal and state law in the past at the Hanford Site.

C: The Permit is a license for operations and construction in order to stay in compliance with the law. There is a problem when a Permit is issued for facilities that are not in compliance and everyone is aware the facilities do not comply with the law. People are fearful of implying criticism, but there is cause for serious criticism. The Board should not be afraid to offer criticism in their advice.

C: The more salient advice points should read “the Board advises” while points in the background section should be written as “the Board recommends” or something similar.

C: Is there an acceptable number of people who can dissent to advice?

R: [Susan H.] There are provisions in the Operating Ground Rules for different levels of consensus. If consensus cannot be reached, the Board can issue majority and minority reports. There is no guidance that dictates how many people can object to advice. However, if a fairly large number of people object then there should probably be majority and minority reports..

C: It would be helpful to identify points that Board members do not completely agree with, but do not entirely object to either. Advice should not be brought forward to the full Board if there are people who strongly disagree. Those points can be brought forward as individual comments.

C: Dissention is not from individuals; it is from the seat they represent. Anyone who dissents should ensure the rest of the representatives on that seat also want to dissent.

C: DOE continues to operate tanks with high levels of waste well beyond their design life and are planning an additional 40 years of operation. There should be some provisions or recommendations from the Board for new storage facilities or tanks to be built.

R: [Ecology] The Permit is not a license to operate; it is a license to close within the given schedule.

C: The general advice points will likely need to incorporate subheadings in order to keep structure to the advice. Advice points relating to specific permit units will still need to be identified with those permit units. Some of the comments can be generalized to apply to the larger Permit.

Q: If we structure the advice to include a section of “overarching” advice bullets, and then use addendums to the advice to include the unit-specific recommendations and the background notes, will Ecology respond to the addendums as well as the advice points?

R: [Ecology] Ecology will respond to everything that is submitted as comments.

The COTW participants agreed to construct the advice to contain overarching advice points, an addendum with unit-specific recommendations (Addendum 1), and an addendum that would contain the Issue Managers’ background notes (Addendum 2).

Review of General Advice Points

Each COTW participant was given a sheet of stickers and instructed to place a sticker next to advice points on enlarged posters of the original 19-pages of draft advice. Points with stickers will be discussed further and considered for bringing forward as an advice bullet. The COTW reviewed the general advice points on-screen. Edits were made for clarity, to delete or combine redundant points, and clarifying what the Board would like to ask for. The COTW also discussed points that might be more appropriate for other avenues as opposed to the Permit advice. Several advice points were determined to reference activities and procedures already laid out by Ecology. These advice points will remain because the Board would like the opportunity to review and verify the procedures. There is an emphasis on accountability and transparency in the advice. The COTW also took note of points specifically requested by Ecology to include in the advice.

Public Comment

- There should be a provision in the advice about waste being transported to the Hanford Site. Additional waste should not be transported to the Hanford Site until the other wastes are cleaned up. The advice should also include a point that the State Environmental Policy Act (SEPA) should have made a Determination of Significance at the Hanford Site. The site has been broken into little pieces so that areas of cumulative impact are not addressed. There should have been a Determination of Significance under SEPA, which would require a comprehensive EIS.
- The point about SEPA determinations should be in the general advice with a recommendation for a mitigated determination. The Single-Shell Tank (SST) Permit Unit in particular should have been determined to have significant effects under state law. A comprehensive EIS should be completed since all Hanford Site projects are connected and are under the same proposal. The legislature and judiciary have recognized the impacts.
- The Board should also include an advice point that the phased review currently underway at the Hanford Site should not be permitted. Even if a phased cleanup and phased construction approach is appropriate, a phased environmental review may not be appropriate. Dividing the project into

smaller pieces and not looking at each element holistically is not permitted under SEPA or the National Environmental Policy Act (NEPA).

- On page 3 of the draft advice document, the Board includes advice regarding Model Toxic Control Act (MTCA) standards being more stringent than other standards. The Washington Administrative Code (WAC) requires use of the most stringent measures that are protective of human health and the environment. The city of Richland and the United States Environmental Protection Agency (EPA) are predicting future residential use for the Hanford Site. Ecology is permitting industrial cleanup standards. The question is what will happen when those areas are excavated in the future and people become exposed to contaminants when digging up the ground for construction or other purposes. That would be a violation of MTCA. Who would be responsible for paying for the cleanup if the land is cleaned to industrial standards which would be in violation of state standards. The MTCA standards should be kept in the official advice.

R: [Board member] The COTW participants agreed to retain that advice point.

Committee Questions and Response

Note: This section reflects individual questions, comments, and agency responses, as well as a synthesis where there were similar questions or comments.

Q: Is there any validity to the public comment about the SEPA determination? The Board may not understand the fullness of these issues.

R: [Board member] The Attorney General was contacted to ask about SEPA and was told it was inappropriate for the Attorney General to say anything because their client is Ecology and there have been significant discussions about this point.

C: The first advice point relates to how the Permit should be more clear or precise, which is echoed throughout additional advice points. The supporting document was not accessible. Having a hyperlink would be helpful as a matter of precision in the presentation of the Permit.

C: The Board should also be considering how Ecology will implement the Board's request. What does the Board expect from Ecology?

C: The notes include specific examples where there are problems with clarity. The Board is not asking for a complete revision; only for clarification in areas identified. The writers tried to phrase the advice in a way where there would not be multiple comments, but Ecology clearly agrees with the points.

C: Whenever the Board is writing advice, they should ask what the agencies are being asked to do to address the problem instead of writing open-ended ideas.

C: It is helpful to leave specific references in the advice so Ecology does not have to go to the notes section to see examples.

C: Using the example of modified and partial closure, the Board has never agreed that there should be conditions included as part of the job. Many of the regulations or codes do not understand the situation at the Hanford Site regarding radiological activity. The regulations may need to be changed to take advantage of a negotiated arrangement. This is a substantive question that can be applied to many areas at the Hanford Site. The code is simply not written for the conditions found at the Hanford Site. The Board does not fully comprehend the implications and outcome under these circumstances.

Q: Are all Permit modifications requests subject to public review?

R: [Ecology] Ecology uses a set process that does include a graded approach. More significant changes require greater public involvement than simple changes.

Q: What is the probability of any new waste stream being discovered at this point?

R: [Board member] There are a lot of containers in the 400 Area and many opportunities for new waste to be discovered. It is important for the public to have an opportunity to know about any new waste. There probably is a modification process in place, as Ecology stated, but the Board would like to have more specific information.

C: There should be an advice point that advises Ecology to include Part II conditions that would bar additional offsite waste to any landfill on the Hanford Site, including any future proposed landfill.

R: [Discussion] Some Board members were unsure if that point would be appropriate to include in the Permit. The advice should be specific to "RCRA landfills." Offsite waste would be barred from the Hanford Site unless it is covered by the Permit. The Board would not like any new waste to be brought to the Hanford Site.

C: There should be an advice point for Ecology to revise or include a Permit condition that would ensure an analytical technique be used for organic material and vapor samples as a part of risk analysis. Worker health concerns relating to vapors are of particular concern.

R: [Discussion] The Board had several questions on this advice point, which was written by Tom Carpenter and Becky Holland. Since neither Tom nor Becky was able to attend the meeting, Susan H. will follow up with them separately for more clarification.

C: The SEPA topic should be included in the overarching advice document.

C: Ecology is specifically requesting other advice points that they would appreciate being brought forward, including the point about constructing more tanks.

R: [Board member] The Board has repeatedly resisted advice to build more tanks due to funding and other concerns. This advice point would likely not pass through Board consensus, although it can be included in the comment section.

C: There is still a huge volume of waste at the Hanford Site, even though there has been some reduction. Vitrification will only address a small part of the remaining waste. DOE will use the tanks for another 40 years. Existing tanks and temporary storage facilities will not be viable through the end of the vitrification process.

C: Decisions on whether to build tanks or not is outside the scope of the Permit.

Review of Unit-Specific Advice Points

The COTW moved into a discussion of the more specific advice points that participants felt strongly about moving forward into the overarching advice. They discussed the formatting options and how to capture headings of the specific Permit unit. A number of advice points were selected to bring forward, including several points requested by Ecology for the Board to include in the advice. The COTW discussed wording changes and clarified several points. It was also noted that some of the points proposed to be brought forward would be unlikely to pass full Board consensus. The following text captures the key discussion points:

C: The Hanford emergency planning process appears to be general throughout the Hanford Site. One of the Board members brought a copy of the Hanford Emergency Management Plan that is referenced throughout the Permit. There should be something more specific in the Permit about contingency planning instead of simply linking to the document. The Board questioned why Ecology chose this approach for emergency management planning.

R: [Ecology] If an attachment to the Permit is part of the regulations to meet the requirements it would be an additional requirement to add a contingency plan or to revise contingency plans.

C: The WAC requirements are often not sufficient for the situation at the Hanford Site because the WACs were created to address dangerous waste. There may be cases where waivers may be necessary to proceed with the cleanup.

R: [Ecology] Ecology does recognize there are major issues and will likely propose new additions to the Permit after having conversations with the Ecology Hazardous Waste Group. One of the proposals will be to determine the acceptable level of knowledge for waste characterization. A certain percentage of tanks will be randomly chosen for sampling. Ecology will work to provide more explanation.

C: There are additional considerations in emergency planning beyond those specific to the problem. For instance, during an earthquake infrastructure such as roads will likely be damaged so there should be a larger overall response plan.

C: Advice points should be explicitly linked to HAB values because not all Board members will be able to read the entire document.

C: The public comments on SEPA were excellent points. Gerry Pollet also made some points along those same lines on the SEPA Determination of Significance. Some Board members believe any advice points about a Determination of Significance in SEPA would not reach Board consensus because that determination would require a comprehensive EIS.

R: [Ecology] If the Board advises Ecology to make a Determination of Significance, they are telling Ecology to cease current operation and conduct an EIS, which would cause challenges.

C: The Board would like Ecology to acknowledge that there are significant impacts at the Hanford Site, even though there was an overall Determination of Non-significance. The Board would not necessarily like Ecology to complete a full EIS; just acknowledge the impacts and mitigate some of those impacts as required under SEPA.

R: [Ecology] The Board could give Ecology language explaining why the Board would like to see a statement of overarching significance.

C: A Determination of Non-significance is misleading since the Permit is done by unit. The Board has received an explanation for why Ecology made the determination, but that explanation was unclear. Some Permit units do indicate significant impacts while others seem to have no significant impacts. An overarching Determination of Non-Significance should be changed to mitigated impacts.

C: The point about a phased review should also be addressed. The Determination of Non-significance was in part a result of the decision to conduct a phased review.

R: [Discussion] The COTW participants asked Gerry Pollet and Lynn Davison to look at the SEPA advice points and Susan H. will work with them on possibly refining the language.

Susan H. said Steve Hudson suggested heading the addendum section “comments, input, and observations” and remove “the Board advises” from these bullets. Sam Dechter drafted possible transition language that the COTW reviewed on-screen and approved.

Framing the Draft Advice for the Board Meeting

The COTW discussed how to best frame the advice at the September Board Meeting. Liz asked if the way she framed the advice that morning was helpful and how it could be revised.

COTW members felt the introduction was good and just needs some fine-tuning to reflect the day’s discussion.

Susan L. offered to assist Liz with the preliminary introduction. Board members who have been actively involved in the preparation of the document could be asked to share any questions or concerns. Those not involved in writing the draft advice should be invited to speak during advice discussion. Ecology will be invited to speak first about the Permit in general to introduce it for those Board members who are unfamiliar with the Permit. The Board requested Dieter to give the introduction from Ecology since he

has presented the information before. Board members will also need to be provided instruction on how to respond to the advice document versus the longer unofficial advice since they will receive the entire packet. Board members will be told they can add their own input to the comments document if they would like. Instructions can also be written out at the top of the draft advice.

Susan H. noted that the advice is now a product of the COTW so presumably none of those present during the COTW meeting will speak out against the advice during the Board meeting on Thursday. Jerry Peltier stated that he would retain the right to object depending on how the draft advice turned out after the final editing of today's product. Susan H. said that COTW participants would have an additional consensus review before the draft advice was provided to Board members in the September Board meeting packet.

C: There are many additional points the COTW did not have a chance to discuss. There may be more points of consensus than is realized. Points are not in the addendum because there was no consensus; only because there has not been enough time to fully discuss them.

C: Board members may want to add additional comments into the addendum in order for it to represent the entire Board. Any new additions should be crafted as early as possible, especially if there are additional points that people would like to bring into the overarching advice.

Susan H. will coordinate with Jean Vanni on matching the notes in Addendum 2 with the overarching advice. Additional Board members are requested to help with editing. Steve Hudson, Dick Smith, Susan Leckband, and Jean Vanni will be responsible for the final draft editing. Edits will be completed by August 15, with the final draft sent to the COTW participants for final review and consensus. The COTW agreed on a tentative call Friday, August 17 at 10 a.m. in case a conversation is needed on the edits.

Attachments

Attachment 1: Draft Advice for the Hanford Facilities Dangerous Waste Permit

Attachment 2: Ecology presentation on the Site-Wide Permit

Attendees

Board Members and Alternates

Tom Carpenter	Mike Korenko	Gerry Pollet (phone)
Lynn Davison	Pam Larsen	Dan Serres (phone)
Sam Dechter	Susan Leckband	Dick Smith
Dirk Dunning	Vince Panesko	Gene Van Liew
John Howieson	Jerry Peltier	Jean Vanni
Steve Hudson	Maynard Plahuta	

Others

Mary Burandt, DOE-ORP	Rick Bond, Ecology	George Klinger, CTUIR
Lori Huffman, DOE-ORP	Madeline Brown, Ecology	Brittany Harris, Public - HoANW intern (phone)
Dana Bryson, DOE-RL	Annette Carlson, Ecology	Nicole Addington, EnviroIssues
	Jane Hedges, Ecology	Susan Hayman, EnviroIssues
	Dan McDonald, Ecology	Sharon Braswell, MSA
	Andrea Prignano, Ecology	Barb Wise, MSA
	Deborah Singleton, Ecology	Annette Cary, Tri-City Herald
	Cheryl Whalen, Ecology	Earl Fordham, W-DOH (phone)
		Tom Rogers, W-DOH